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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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MIGUEL LOPEZ individually *and on behalf of others*  
*similarly situated,*

*Plaintiff*

,

-against-

ANGELITO GUZMAN, ANGELITO AUTO REPAIR  
(DBA ANGELITO AUTO REPAIR)

*Defendants.*

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**NOTICE OF MOTION**

**29 U.S.C. 216(b)  
Collective Action Claim**

**ECF Case**

**PLEASE TAKE NOTICE** that upon the accompanying Declaration of Lina Franco., dated October 16th, 2018, and all prior pleadings and proceedings herein, plaintiffs' counsel will move this Court before the Honorable Cheryl Pollak, U.S.M.J., at the United States Courthouse, 225 Cadman Plaza East, Brooklyn NY , on a date set by the Court, or as soon thereafter as counsel can be heard, for an Order:

- 1) Protecting plaintiff from any discovery demand that involves plaintiffs' immigration status or citizenship at the present or any point in time, during discovery and through the time of trial;
- 2) Protecting plaintiff from any discovery demand that involves disclosing plaintiff's tax ID numbers and generally precluding defendants' access to plaintiffs' tax returns and questions regarding tax returns.

Dated: New York,  
October 16, 2018

/s/  
Lina Franco

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